

SUMMARY OF ACTIONS ITEMS OCTOBER 2004 QUARTERLY MEETING

Monday 10/25/04 Site Visits

TAN – VCO TAN-031closure - no specific action items

Tuesday 10/26/04

RCRA/CERCLA Integration Discussion Opportunity - no specific action items

Status of CERCLA Removal Actions - no specific action items

RCRA Closures Status – BBWI to provide information to DEQ regarding valves in the NWCF system closure

Contract Transition – DOE-ID to send DEQ letter on ANL permit transfer

SAA/Maintenance Type Wastes – BBWI to submit letter to DEQ

BREAKOUT SESSIONS

RCRA Permitting Status

- RWMC Re-application Format - no specific action items
- Volume 22 CSSF Application - no specific action items
- PMRs Status/Future PMRs
 - Volume 5 (RWMC) – DEQ needs transfer date for WMF-610 from DOE-ID
 - Volume 14 (ILWMS) - no specific action items
 - Volume 18 (INTEC)- no specific action items

ISDs WAP Updates – A discussion was held regarding Waste Analysis Plans (WAP) associated with the Interim Status Documents (ISD) at INTEC. Present during this discussion were Kent Miller, Dave Hutchison, Bret Peck, Ron Bone, Ann Boehmer, Susan Evans, Corrinne Jones, Jim Valentine (BBWI), Tim Safford, Don Rasch (DOE) and Mike Gregory, Mike Spomer, Bob Bullock, Natalie McLeod (DEQ). It was explained to DEQ that after the implementation of the volumes 14 and 18 of the RCRA Part B Permit, there are seven remaining Interim Status units at INTEC. As part of the corrective actions associated with the 2004 Notice of Violation Consent Order (NOV CO) BBWI was in the process of re-evaluating all of the WAPs associated with these ISD units. It was also explained to DEQ that these units are in various stages of closure, permitting or continued operation associated with a specific compliance agreement. BBWI proposed to DEQ that the following actions be taken for each of the ISD units at INTEC:

Storage Tank VES-SFE-106, a RCRA closure plan has been developed and is currently with DEQ for their review and comment. Closure of this tank will commence upon DEQ's approval of the closure plan. Because this unit is undergoing closure, no changes will be made to the ISD WAP.

Tank Farm Facility, a number of these tanks are currently undergoing closure. The remainder of the tanks will be operated under the NON CO until the last phase of closure is completed on or before the year 2012. The waste analysis plan for these operating units will be re-evaluated and updated as necessary.

Calcine Solids Storage Facility, the RCRA Part B permit application (volume 22) has been transmitted to the DEQ. Any updates or modifications to the WAP will be addressed through the

permitting process. There is no further action planned for modifying ISD WAP for the CSSF outside of the permitting process.

New Waste Calcining Facility, the closure certification is currently at DEQ awaiting their concurrence. Because this unit is undergoing closure, no changes will be made to the ISD WAP.

Headend Process Waste Tanks, all of the process waste inputs to these tanks have been discontinued. Currently the tanks only receive waste as a result of precipitation in-leakage to the CPP-601/640 building. Future needs for the operation of these tanks to support characterization and decontamination of the CPP-601/640 buildings are currently being evaluated. A decision to update the ISD WAP will be made based on any projected uses for the tank system. If a decision is made not to use the tanks for characterization and decontamination, a closure plan date will be included in the next revision of the RCRA Work Plan. (Decision has been made to update the WAP pending determination of future use)

Evaporator Tank System; Evaporator Tank System, the ISD WAP for this unit was updated and transmitted to DEQ per the recent Notice of Violation consent Order. No further changes are planned at this time. Any updates or modifications to the WAP will be addressed through the permitting process

D-Cell, a RCRA closure plan has been developed and is currently with DEQ pending certification. Because this unit is undergoing closure, no changes will be made to the ISD WAP.

DEQ stated at the meeting that they agreed with the approach described above for each of the ISD units.

WCF Post-Closure Permit Monitoring – meeting to be scheduled for discussion of wells/well network

VCO topics – Two topics were discussed during the VCO breakout session: 1) alternative to submittal of New Site Identification Forms (NSIFs) for VCO septic systems, and 2) changes to the Catch Tank System (CTS) closure plan. A summary of these discussions follows.

VCO Septic Systems

The INEEL explained that the VCO SITE-TANK-005 Action Plan includes several septic systems, three of which were active (systems for CPP-626 and CPP-656 [INTEC-098 tank system], and the WERF system [PBF-001]), two inactive. Characterization documents for these systems have been submitted, and approved by DEQ, as part of the 75% SITE-TANK-005 characterization milestone. In each case, the systems have been characterized as nonhazardous with a potential to release Appendix VIII constituents. In accordance with the VCO, the next deliverable for these systems is the submittal of a schedule for submitting NSIFs.

As an alternative to the submittal of NSIFs for these tank systems, the INEEL proposed moving the active systems to Appendix C by "handing off" to IDAPA regulations governing the operation and abandonment of septic systems (IDAPA 58.01.03). Copies of the IDAPA requirements for septic tank abandonment were provided for review. Upon abandonment, the INEEL further clarified that the tanks and drain field would be picked up via the 5-year review process and assessed for the need for further evaluation. After some discussion, the DEQ agreed that provided active septic systems were operated and abandoned in accordance with the IDAPA requirements, no further action was required under the VCO.

For the inactive septic systems, the INEEL proposed that the tanks be moved to Appendix C when abandoned in accordance with the IDAPA requirements (solids removed and the tank either backfilled with inert materials, destroyed or removed), arguing that once the waste had been removed from the tank and the tank had been removed or backfilled, the potential to release Appendix VIII constituents would no longer exist. As with the active systems, drain fields will be evaluated with the tanks using the 5-year review process under the FFA/CO. The DEQ agreed that inactive septic tanks could be moved to Appendix C once abandoned under IDAPA 58.01.03.

CTS Closure Plan

The INEEL passed out copies of the draft response to the Notice of Deficiency (NOD), copies of a revised closure plan schematic showing the boundaries of FFA/CO Site TRA-19 and revised action level development documentation. These documents had also been forwarded electronically to DEQ the previous Friday, October 22. The INEEL stated that, in addition to any questions DEQ may have regarding the draft responses, they would like to primarily discuss two changes to the amended closure plan that were being proposed in addition to the specific responses to the NOD. The first concerned establishing the boundaries of FFA/CO Site TRA-19, the second a proposed increase in the action levels.

The INEEL explained that the boundary of Site TRA-19 had not been delineated in the OU 2-13 Record of Decision (ROD), and that the boundary depicted in the schematic had been developed based on the written description of the site in the ROD and corresponding Remedial Investigation/Feasibility Study (RI/FS). Given that a portion of the CTS components fall within the newly defined boundaries of Site TRA-19, the closure plan language addressing the characterization of soils was revised to state that analytical data for soils sampled within Site TRA-19 will be forwarded to the CERCLA program for further evaluation, with no further actions required under closure. Soils sampled outside Site TRA-19 that pose an unacceptable risk to human health will be excavated to the extent practicable (less than 10 ft in depth or not encroaching on other facilities, roads or systems) to reduce the risk to acceptable levels. If soil removal is not practicable, a NSIF will be submitted to allow further evaluation under the FFA/CO. The DEQ stated that while 10 feet should not be considered a default condition in determining practicability, it was a good starting point.

Regarding action levels, the INEEL explained that in several cases the levels established in the original CTS closure plan and adopted in the amended plan were lower than required to be protective of human health, and that increasing the action levels may significantly reduce the time and resources required to meet the closure standard for several of the CTS components. Accordingly, new action levels were being proposed, accompanied by revised action level development documentation.

The DEQ stated that they would need more time to review the proposed changes, and that they would be getting back to us with any comments.

Wednesday 10/27/04

Volume 14 Permit Handoff Meeting – no specific action items